

Job Specific Environmental Awareness Training - Satellite Area Manager

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Course Objective: The management of hazardous waste in Satellite Accumulation Areas at NSLS is an important function in ensuring compliance with Laboratory and RCRA regulations for handling hazardous chemical wastes and for protecting the environment. This course has been designed to provide Satellite Area Managers with the information needed to carryout this role. The contents of this training have been extracted from the NSLS PRM and BNL Subject Area.

Qualification Requirements: The Satellite Accumulation Area Manager shall complete this Environmental Awareness Training, and annually the web based "Hazardous Waste Generator" training.

Your Role and Responsibility: As the Satellite Accumulation Area Manager, you are responsible for overseeing the day-to-day operations of the Satellite Accumulation Area. As the Satellite Accumulation Area Manager, you are responsible for monitoring the day-to-day conditions within the Satellite Accumulation Area. The following is a list of your duties:

- Monitor conditions and activities within the Satellite Accumulation Area and ensure that SAA requirements are met. (These rules are posted adjacent to the accumulation area.)
- Formally inspect the Satellite Accumulation Area weekly using the SAA inspection checklist and forward it to the NSLS Safety Engineer.
- Contact the NSLS Safety Engineer if you need to modify or relocate the accumulation area, or if there are persistent noncompliance issues that require NSLS management attention.

Detailed information regarding the Satellite Accumulation Areas and other waste requirements are available on the NSLS and BNL ESH Web pages. In particular, the BNL Subject Area "Hazardous Waste Management" available through the BNL SBMS is an important source of information. Consult with NSLS Safety Engineer or the NSLS ECR if you have questions.

Response to Leaks: Spills of chemicals or chemical wastes must be immediately addressed to prevent injury to personnel or releases to the environment. Report even minor spills to the NSLS Operations Coordinator or to the NSLS Control Room Operator (X2550). Report the material, volume, and location of the spill. Spill response kits are located in various parts of the building and should be used to prevent release to drains and to clean minor spills. Major leaks should be secured to the extent possible and reported to the Lab emergency response number x2222 (followed by the Control Room at x2550) as soon as possible so that BNL personnel can be prepared for potential impacts at the Sewage Treatment Plant.

Potential Regulatory and Environmental Impacts: Work involving generation of hazardous chemical wastes must comply with Federal requirements established by the U.S. Environmental Protection Agency, and is subject to enforcement action by the EPA and New York State Department of Environmental Conservation. Your SAA will be used by waste generators until the waste is ready for transfer to the NSLS 90-Day Storage Area by the generator or other qualified person.

Violations of RCRA requirements should be promptly corrected. The following is a list of common violations subject to EPA fines that you should pay particular attention to:

- hazardous waste label missing from container,
- contents missing from waste label,
- non-waste chemicals stored in the waste accumulation area tray, and
- open containers.

Signature conveys that you have read and understand this information.

Print Name

Sign Name

Life Number

Date

NSLS Environmental Management Training

Background Environmental and hazardous waste management regulations are among the most sensitive and visible issues in the American society. At BNL, these regulations are indisputably the most sensitive topic within the ESH arena since environmental releases and the perception of poor waste handling practices were at the heart of the AUI discharge by DOE and in the development of the strong management emphasis on these issues. In light of the high visibility and sensitivity to these issues, BNL management committed to the development of an Environmental Management Program that met all the requirements of ISO 14001, an international organization which has adopted standards for many types of programs, including environmental management.

A key issue within ISO 14001 is the identification of all activities at a facility that are associated with significant environmental aspects. All activities involving a significant aspect are to be managed and controlled to ensure that no adverse environmental impact results. As a part of that program, all personnel whose work involves a significant environmental aspect¹ will be provided specific environmental awareness training relating to their duties.

There are several work activities at NSLS that are involved with our facilities' significant environmental aspects. These activities are:

- Regeneration of process water mixed bed deionizing and Cooling Water System Maintenance
- Machine shop operations
- Photographic dark room operations
- Vacuum pump maintenance
- Electrical/mechanical assembly
- Experimental Program
- 90 Day/Satellite Area Operation
- Silicon Crystal Etching

For each of these activities, job specific training has been developed to ensure knowledge of applicable requirements that should be followed to properly control the significant environmental aspects.

¹ Significant environmental aspects have been defined at BNL as involving any of the following issues:

- Generation of any amount of industrial, hazardous, radioactive, mixed or medical wastes
- Air or liquid effluents or emissions exceeding defined values
- Storage or use of chemicals or radioactive material above certain thresholds